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8  
9 **BEFORE THE**  
**BOARD OF REGISTERED NURSING**  
10 **DEPARTMENT OF CONSUMER AFFAIRS**  
11 **STATE OF CALIFORNIA**

12 In the Matter of the Accusation Against:

Case No. *2013-892*

13 **CRYSTAL DANELLE DIXON,**  
14 **AKA CRYSTAL DANIELLE WATERS,**  
15 **AKA CRYSTAL DANIELLE DIXON**  
**21622 Marguerite Parkway, Apt. 406**  
**Mission Viejo, CA 92692**

**A C C U S A T I O N**

16 **Registered Nurse License No. 650526**

17 Respondent.

18  
19 Complainant alleges:

20 **PARTIES**

21 1. Louise R. Bailey, M.Ed., RN (Complainant) brings this Accusation solely in her  
22 official capacity as the Executive Officer of the Board of Registered Nursing, Department of  
23 Consumer Affairs.

24 2. On January 4, 2005, the Board of Registered Nursing issued Registered Nurse  
25 License Number 650526 to Crystal Danelle Dixon, also known as Crystal Danielle Waters and  
26 Crystal Danielle Dixon (Respondent). Respondent has also been known as Danielle Dixon  
27 Waters, Danielle Waters, Crystal D. Dixon, Danielle Dixon, and Crystal Dixon. The Registered  
28 Nurse License expired on June 30, 2006, and has not been renewed.

## JURISDICTION

3. This Accusation is brought before the Board of Registered Nursing (Board), Department of Consumer Affairs, under the authority of the following laws. All section references are to the Business and Professions Code unless otherwise indicated.

4. Section 2750 of the Business and Professions Code (Code) provides, in pertinent part, that the Board may discipline any licensee, including a licensee holding a temporary or an inactive license, for any reason provided in Article 3 (commencing with section 2750) of the Nursing Practice Act.

5. Section 2764 of the Code provides, in pertinent part, that the expiration of a license shall not deprive the Board of jurisdiction to proceed with a disciplinary proceeding against the licensee or to render a decision imposing discipline on the license. Under section 2811, subdivision (b) of the Code, the Board may renew an expired license at any time within eight years after the expiration.

## STATUTORY PROVISIONS

6. Section 2761 of the Code states:

The board may take disciplinary action against a certified or licensed nurse or deny an application for a certificate or license for any of the following:

(a) Unprofessional conduct, which includes, but is not limited to, the following:

....

(4) Denial of licensure, revocation, suspension, restriction, or any other disciplinary action against a health care professional license or certificate by another state or territory of the United States, by any other government agency, or by another California health care professional licensing board. A certified copy of the decision or judgment shall be conclusive evidence of that action.

....

## COST RECOVERY

7. Section 125.3 of the Code provides, in pertinent part, that the Board may request the administrative law judge to direct a licentiate found to have committed a violation or violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case, with failure of the licentiate to comply subjecting the license to not

1 being renewed or reinstated. If a case settles, recovery of investigation and enforcement costs  
2 may be included in a stipulated settlement.

### 3 DRUGS

4 8. Demerol is a Schedule II controlled substance as designated by Health and Safety  
5 Code section 11055, subdivision (c)(17) and is a dangerous drug under Code section 4022.

6 9. Fentanyl is a Schedule II controlled substance as designated by Health and Safety  
7 Code section 11055, subdivision (c)(8) and is a dangerous drug under Code section 4022.

### 8 CAUSE FOR DISCIPLINE

#### 9 (Out Of State Discipline)

10 10. Respondent has subjected her Registered Nurse License to disciplinary action  
11 under Code section 2761, subdivision (a)(4), in that her license to practice nursing in South  
12 Carolina was disciplined by the South Carolina Department of Labor, Licensing and Regulation  
13 State Board of Nursing (South Carolina Board) in a disciplinary action, which resulted in her  
14 license being temporarily suspended. The circumstances are as follows:

15 11. Respondent is a Registered Nurse holding Registered Nurse License number  
16 87608 issued by the South Carolina Board, which was in current status and in full force and  
17 effect at all times relevant to the charges brought.

18 12. In March 2013, the South Carolina Board took disciplinary action against  
19 Respondent's registered nurse license in a matter entitled, *In the Matter of CRYSTAL DANIELLE*  
20 *WATERS, RN License # RN 87608, Respondent. OIE #2013-8*, by issuing a public Order of  
21 Temporary Suspension, in accordance with the South Carolina Nurse Practice Act (SCNPA)  
22 section 40-33-5, et seq. and South Carolina Code of Laws (SCCL) section 1-23-370, subdivision  
23 (c), suspending Respondent's license to practice nursing in the State of South Carolina pursuant  
24 to SCCL sections 1-23-370, subdivision (c) and 40-33-110.

25 13. The facts that led to the discipline are as follows. On March 18, 2010, Respondent  
26 was reported to the South Carolina Board for attempting to divert for personal use a quantity of  
27 Demerol, a schedule II controlled substance, while employed at Mary Black Hospital in  
28 Spartanburg, South Carolina. On March 29, 2010, the Bureau of Drug Control of the South

1 Carolina Department of Health and Environmental Control charged Respondent with six counts  
2 of theft of a control substance and four counts of failure to maintain narcotic records. On April 6,  
3 2010, Respondent received a negative diagnosis after bleaching her hair prior to a hair follicle  
4 test. On April 12, 2010, Respondent was hired by Plastic Surgery Center of the Carolinas in  
5 Spartanburg, South Carolina but her employment was terminated on May 27, 2010, due to her  
6 inability to explain missing Demerol and Fentanyl, schedule II controlled substances, and failure  
7 to document medications authorized for patients. On June 14, 2010, Respondent was issued a  
8 temporary suspension order as a result of the aforementioned acts. On December 14, 2010,  
9 Respondent voluntarily surrendered her license. On January 5, 2012, Respondent signed a  
10 Memorandum of Agreement admitting to the foregoing facts, which are grounds that constitute  
11 misconduct in violation of SC Code sections 40-1-110 and 40-33-110.

12 14. On March 9, 2012, the South Carolina Board issued a public Amended Final  
13 Order accepting the Memorandum of Agreement and Stipulations and adopting it in its  
14 resolution of the disciplinary action in a matter entitled, *In the Matter of CRYSTAL DANIELLE*  
15 *WATERS, RN License No. RN 87608, Respondent. Case Nos. 2010-118 and 2010-217.* In the  
16 Amended Final Order, Respondent was placed on probation for a period of one year pursuant to  
17 SCCL sections 40-1-90 and 40-33-10, and South Carolina Administrative Procedures Act section  
18 1-23-10, et seq. and was required to meet all conditions of reinstatement as outlined by the South  
19 Carolina Board.

#### 20 PRAYER

21 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,  
22 and that following the hearing, the Board of Registered Nursing issue a decision:

23 1. Revoking or suspending Registered Nurse License Number 650526, issued to  
24 Crystal Danelle Dixon, also known as Crystal Danielle Waters and Crystal Danielle Dixon;

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2. Ordering Crystal Danelle Dixon to pay the Board of Registered Nursing the reasonable costs of the investigation and enforcement of this case, pursuant to Business and Professions Code section 125.3;

3. Taking such other and further action as deemed necessary and proper.

DATED: April 9, 2013

Louise R. Bailey  
LOUISE R. BAILEY, M.ED., RN  
Executive Officer  
Board of Registered Nursing  
Department of Consumer Affairs  
State of California  
*Complainant*

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